

1 **EXHIBIT G**

2 **UNITED STATES DISTRICT COURT**
3 **DISTRICT OF NEVADA**

4 **Drew J. Ribar,**
5 Plaintiff,

6 v.

7 **State of Nevada ex rel. Nevada Department of Corrections, Carson City, et al.,**
8 Defendants.

9 **Case No. 3:24-cv-00103-ART-CLB**

10 **EXHIBIT G – AFFIDAVIT OF DREW J. RIBAR**

11 **Affidavit Supporting Summary Judgment and Rebuttal of Qualified Immunity**

12
13
14 I, **Drew J. Ribar**, declare under penalty of perjury under the laws of the United States and the
15 State of Nevada that the following is true and correct to the best of my knowledge:
16

17 **1. Vehicle Ownership**

18 I am the registered owner of a **2014 GMC Sierra**, which was parked near the Northern
19 Nevada Correctional Center on **August 30, 2022**, during the events giving rise to this
20 litigation.
21

22 **2. Non-Consensual Tow**

23 My vehicle was towed without my consent or knowledge by order of Deputy Sean
24 Palamar of the Carson City Sheriff's Office. I was not issued a citation related to the
25 parking of the vehicle, and the tow was conducted **without a warrant**, inventory, or
26 exigent circumstances.
27
28

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1 **3. Business Ownership and Status**

2 I built and run **A&A Towing, Inc.**, a **family-owned towing business** that has served the
 3 Carson City area for multiple decades. At the time of the incident and continuing through
 4 today, A&A Towing, Inc. has been an **authorized vendor on the Carson City Sheriff's**
 5 **Department's towing rotation list**, regularly responding to law enforcement service
 6 calls.

7
 8 **4. Business Harm**

9 The unauthorized tow of my personal vehicle by a competing tow provider, under the
 10 supervision of the Carson City Sheriff's Office, and the recorded statements threatening
 11 my place on the towing rotation (see Exhibit E, 0:01:20), reflect retaliatory intent that
 12 harmed both my professional reputation and the operations of A&A Towing, Inc.

13
 14 **5. Support for Summary Judgment**

15 I submit this affidavit in support of my **Amended Complaint** and forthcoming **Motion**
 16 **for Summary Judgment** under **Fed. R. Civ. P. 56**, as it demonstrates:

- 17
- 18 ○ My property was seized without legal justification, in violation of the Fourth and
 - 19 Fourteenth Amendments.
 - 20 ○ The seizure and accompanying statements support claims of **First Amendment**
 - 21 **retaliation** for constitutionally protected filming.
 - 22 ○ My economic and reputational interests were adversely affected without due
 - 23 process.
 - 24

25
 26 Executed on this **27th day of March, 2025**, in Washoe Valley, Nevada.

1 /s/ **Drew J. Ribar**

2 Drew J. Ribar

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